

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

DURA AUTOMOTIVE SYSTEMS, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 19-12378 (KBO)
)
) (Jointly Administered)
)
) **Re: Docket No. 1062**

**CERTIFICATION OF COUNSEL REGARDING
DEBTORS' MOTION FOR ENTRY OF AN ORDER
AUTHORIZING AND APPROVING PROCEDURES TO
REJECT EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

I, Daniel N. Brogan, counsel for the above-captioned debtors and debtors in possession (collectively, the "Debtors"), hereby certify and state as follows:

1. On May 26, 2020, the Debtors filed the *Debtors' Motion for Entry of an Order Authorizing and Approving Procedures to Reject Executory Contracts and Unexpired Leases* [Docket No. 1062] (the "Motion")² in the United States Bankruptcy Court for the District of Delaware (the "Court") and attached thereto a proposed form of order granting the Motion (the "Original Proposed Order").

2. Pursuant to the Motion, any objections to the entry of an order granting the relief sought therein were to be filed and served by June 2, 2020 at 4:00 p.m. (ET) (the "Objection Deadline").

3. The Debtors received informal comments regarding the Motion and the Original Proposed Order from the Office of the United States Trustee for Region 3 (the "U.S. Trustee").

¹ The debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2304); and NAMP, LLC (3693). Dura Automotive Systems, LLC's service address is: 1780 Pond Run, Auburn Hills, Michigan 48326.

² Capitalized terms used but not defined herein have the meaning given to such terms in the Motion.

No other answer, objection, or response to the Motion has been received by the undersigned counsel to the Debtors.

4. The Debtors have resolved all comments received from the U.S. Trustee. A revised form of order reflecting such resolution is attached hereto as Exhibit A (the “Revised Proposed Order”). A blackline comparing the Revised Proposed Order against the Original Proposed Order is attached hereto as Exhibit B.

5. The U.S. Trustee has been provided with a copy of the Revised Proposed Order and confirmed that it does not object to its entry.

[Remainder of page intentionally left blank.]

WHEREFORE, the Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

Dated: June 4, 2020
Wilmington, Delaware

BAYARD, P.A.

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